

**Federal Defenders
OF NEW YORK, INC.**

Southern District
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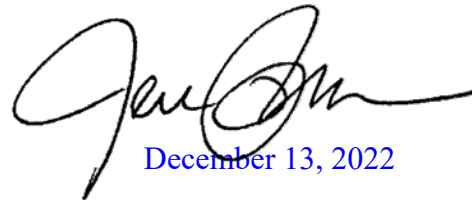
December 12, 2022

BY ECF

The Honorable Jesse M. Furman
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

Application GRANTED. The pretrial conference is hereby
ADJOURNED to January 31, 2023, at 2:30 p.m. Time is
excluded in the interests of justice from today, December
13, 2022 until January 31, 2023 for the reasons stated in
defense counsel's letter. The Clerk of Court is directed to
terminate Doc. #12. SO ORDERED.

RE: United States v. Gustavo Chavez
22 Cr. 303 (JMF)



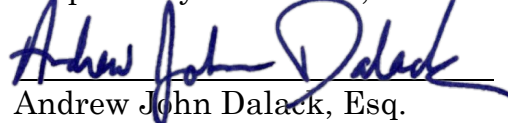
December 13, 2022

Dear Judge Furman:

I write on behalf of the parties to provide a status update in the above-captioned case, and to request a 45-day adjournment of the conference scheduled for December 14, 2022.

The parties remain engaged in plea negotiations. Given Mr. Chavez's age, lack of a criminal record, chronic illness, and immigration status, the defense is attempting to negotiate a resolution to his case that will neither require a term of imprisonment nor necessarily cause him to be deported. The defense needs more time to finalize and submit its mitigation letter. The Government consents to this application, and moves for the exclusion of time under 18 U.S.C. § 3161(h)(7)(A). The defense consents to this application and agrees that the interests of the public and Mr. Chavez in a speedy trial are outweighed by the need to advance productive plea negotiations. The defense also wishes to inform the Court that Mr. Chavez remains fully compliant with the terms of his pre-trial supervision and has a strong rapport with his pre-trial officer.

Respectfully Submitted,



Andrew John Dalack, Esq.
Assistant Federal Defender

Counsel for Gustavo Chavez

Cc: AUSA Andrew Jones